

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

In re:	)	Case No. 08-14706
	)	
Juliana L Lam,	)	Hon. Carol A. Doyle
	)	Chapter 7
Debtor.		Hearing Date: 9-16-08 at 10:00 a.m.

**NOTICE OF MOTION**

Alex D. Moglia, not individually but solely as trustee, has filed his **ROUTINE MOTION TO EXTEND TIME TO OBJECT TO DISCHARGE** with the Clerk of the Bankruptcy Court, 219 South Dearborn Street, Chicago, Illinois 60604. A copy is served upon you either through the Court's Electronic Notice for Registrants or through First Class mail.

The Trustee has scheduled the Motion to be presented on **September 16, 2008**, at **10:00 a.m.** in **Courtroom 742** of the United States Bankruptcy Court, 219 South Dearborn Street, Chicago, Illinois 60604.

**THE PROPOSED ORDER APPENDED TO THIS ROUTINE MOTION MAY BE ENTERED BY THE JUDGE WITHOUT PRESENTMENT IN OPEN COURT UNLESS A PARTY IN INTEREST NOTIFIES THE JUDGE OF AN OBJECTION THERETO PURSUANT TO LOCAL RULE 9013-9(c).**

\_\_\_\_\_  
/s/ Bruce de'Medici

Bruce de'Medici  
Law Office of Bruce E. de'Medici  
333 West Wacker Drive  
Suite 300  
Chicago, Illinois 60606  
312.251.1000

### **CERTIFICATE OF SERVICE**

I, Bruce de'Medici, an attorney who is licensed to practice law in the State of Illinois, certify that on the 2<sup>nd</sup> day of September, 2008, I served a copy of the foregoing Notice of Motion and the attached Routine Motion to Extend Time to Object to Discharge upon the Registrants listed below through this Court's Electronic Notice for Registrants and facsimile transmission as indicated below, and upon the debtor through First Class mail. I further certify that copies of documents required to be served by Fed. R. Civ. P. 5(a), made applicable by Fed. R. Bank. P. 7005, have been served.

#### **Electronic Notice for Registrants and Facsimile Transmission as indicated**

Office of the U.S. Trustee Facsimile: 312.886.5794 Email: <a href="mailto:USTPRegion11.es.ecf@usdoj.gov">USTPRegion11.es.ecf@usdoj.gov</a>	Alex D. Moglia Moglia Advisors E mail: <a href="mailto:amoglia@mogliaadvisors.com">amoglia@mogliaadvisors.com</a>
	Richard H Fimoff Robbins, Salomon & Patt Ltd Facsimile: 312.782.6690 Email: <a href="mailto:rfimoff@rsplaw.com">rfimoff@rsplaw.com</a>

#### **Service by First Class Mail**

Juliana L. Lam  
10318 SW 49th Lane  
Gainesville, FL 32608

\*\*\*\*\* -COMM. JOURNAL- \*\*\*\*\* DATE SEP-02-2008 TIME 15:19 \*\*\*\*\*  
Document Page 3 of 6

MODE = MEMORY TRANSMISSION

START=SEP-02 15:18

END=SEP-02 15:19

FILE NO.=544

STN NO.	COMM.	ONE-TOUCH/ ABBR NO.	STATION NAME/EMAIL ADDRESS/TELEPHONE NO.	PAGES	DURATION
001	OK	2	13128865794--80007	006/006	00:00:51

-MANDELL MENKES &amp; SURDYK, -

\*\*\*\*\* - 312 251 1010- \*\*\*\*\*

Law Office of Bruce E. de'Medici  
333 West Wacker Drive  
Suite 300  
Chicago, Illinois 60606  
Phone: (312) 251-1000

To: Office of the United States Trustee From: Bruce E. de'Medici  
Date: September 2, 2008  
Fax Number: (312) 886-5794 Total Pages: 6 (including cover page)

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Message:

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FILE NO.=914

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**Law Office of Bruce E. de'Medici**  
**333 West Wacker Drive**  
**Suite 300**  
**Chicago, Illinois 60606**  
**Phone: (312) 251-1000**  
**Fax: (312) 251-1010**

<b>To:</b>	Richard H Fimoff	<b>From:</b>	Bruce de'Medici
<b>Firm:</b>	Robbins, Salomon & Patt Ltd	<b>Date:</b>	September 2, 2008
<b>Fax Number:</b>	312.782.6690	<b>Total Pages:</b>	6 (including cover page)

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In re:	)	Case No. 08-14706
	)	
Juliana L Lam,	)	Hon. Carol A. Doyle
	)	Chapter 7
Debtor.		Hearing Date: 9-16-08
		at 10:00 a.m.

**ROUTINE MOTION TO EXTEND TIME TO OBJECT TO DISCHARGE**

Alex D. Moglia, as trustee for the estate of Juliana L. Lam, states in support of his routine motion to extend, pursuant to Fed. R. Bankr. P. 4004(b) and 9006(b), the time within which he may object to the debtor receiving a discharge, and states in support as follows:

1. Juliana L. Lam, debtor herein (the "Debtor") commenced this case on June 9, 2008, by filing a voluntary petition for relief under chapter 7 of the United States Bankruptcy Code, 11 U.S.C. §101, *et seq.* The Office of the United States Trustee appointed Alex D. Moglia to administer the estate as the chapter 7 trustee. The Clerk of the Court scheduled the meeting of creditors for July 2, 2008. The Trustee continued the meeting of creditors to July 23, 2008.

2. The Debtor's schedules and statement of financial affairs contain information about significant transactions with other parties, including outstanding loans by the Debtor to third parties of \$1,500,000, \$285,000, and \$90,000, and a judgment that the obligor on the \$1,500,000 loan obtained against the Debtor. The schedules also reflect ownership of three patents for software and equity in certain entities, and minimal assets. The Trustee is sorting through this information to determine if the Debtor

accurately listed all of her assets, to correspond to the magnitude of her loans and apparent business dealings.

3. The Trustee has an obligation to consider whether grounds exist to object to the Debtor receiving a discharge or seek dismissal of this case pursuant to section 727(a)(1) of the Code. The Trustee has not determined whether grounds in fact exist to object to the Debtor's discharge; the Trustee requires additional time to make this determination.

4. The time within which parties may object to the Debtor receiving a discharge expires September 2, 2008. To avoid this Court granting the Debtor a discharge while the Trustee is engaged in the foregoing, and to preserve the Trustee's ability to potentially object to the Debtor receiving a discharge, pursuant to Fed. R. Bankr. P. 4004(b) and 9006(b) the Trustee requests that this Court extend for an additional sixty days the time within which he may file any objection.

WHEREFORE, Alex D. Moglia, as Trustee for the estate of Juliana L. Lam, prays that this Court enter an order pursuant to Fed. R. Bankr. P. 4004(b) and 9006(b) to extend for an additional sixty days the time within which the Trustee may object to the Debtor receiving a discharge and grant such further relief as this Court deems appropriate.

Respectfully submitted,  
Alex D. Moglia, as trustee for Juliana L. Lam

By: /s/ Bruce de'Medici  
One of his attorneys

Bruce de'Medici #6184818  
Law Office of Bruce E. de'Medici  
333 West Wacker Drive, Suite 300  
Chicago, Illinois 60606  
312.251.1000